

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HAYWOOD, et al., §
§
Plaintiffs, §
§
v. § **Civil Action No. 3:22-cv-2174-C-BT**
§
TEXAS REALATOR, et al., §
§
Defendants. §

**REPLY IN SUPPORT OF
DEFENDANTS PENNYMAC LOAN SERVICES, LLC'S AND
MACKIE WOLF ZIENTZ & MANN, P.C.'S MOTION TO DISMISS PURSUANT
TO FEDERAL RULE OF CIVIL PROCEDURE 12(B)(5)**

Defendants PennyMac Loan Services, LLC (“PennyMac”) and Mackie Wolf Zientz & Mann PC (“MWZM”, collectively “Defendants”), file this *Reply in Support of Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(5)* and respectfully show the Court as follows:

I.

Plaintiff Tianikwa Haywood (“Plaintiff”) in her Objection to Defendants’ Motion to Dismiss [ECF No. 13] offers nothing to suggest that she properly served either Defendant. Contrary to Plaintiff’s assertions, service of summons and complaint by regular United States mail is not permitted under either the Federal Rules of Civil Procedure or the Texas Rules of Civil Procedure. Further, Plaintiff in her Response says nothing about service on PennyMac.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request this Court dismiss Plaintiffs’ Complaint with prejudice and grant Defendants all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ Mark D. Cronenwett
MARK D. CRONENWETT
Attorney in Charge
Texas Bar No. 00787303
mcronenwett@mwzmlaw.com

MACKIE WOLF ZIENTZ & MANN, P. C.
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254
Telephone: (214) 635-2650
Facsimile: (214) 635-2686

Attorneys for Defendants Mackie Wolf Zientz & Mann, P.C. and PennyMac Loan Services, LLC

CERTIFICATE OF SERVICE

The undersigned further certifies that on November 8, 2022, a true and correct copy of the foregoing document was delivered via regular United States mail to the following counsel of record:

Tianikwa Haywood
3222 Burgundy Lane
Midlothian, Texas 76065
Pro Se Plaintiff

/s/ Mark D. Cronenwett
MARK D. CRONENWETT